To: Tisa, Kimberly[Tisa.Kimberly@epa.gov]; Haklar, James[Haklar.James@epa.gov]; Mullin, Michelle[Mullin.Michelle@epa.gov]; Bean, Mark[Bean.Mark@epa.gov]; Bunker, Kelly[Bunker.Kelly@epa.gov]; Dandurand, Michael[dandurand.michael@epa.gov]; Hensley, Amy[Hensley.Amy@epa.gov]; Ramanauskas, Peter[ramanauskas.peter@epa.gov]; Sales, James[sales.james@epa.gov]; Santos, Carmen[Santos.Carmen@epa.gov]; South, Brenda[South.Brenda@epa.gov]
Cc: Gimlin, Peter[Gimlin.Peter@epa.gov]; Courtnage, Robert[Courtnage.Robert@EPA.GOV]; Schulz, Susan[Schulz.Susan@epa.gov]
From: Feely, Ken
Sent: Thur 1/28/2016 2:00:01 PM
Subject: RE: what solvent should a school use to clean up a leak from a FLB?
PCBs in Bldg Matls - ORD 2012.pdf

What about terpene based solvents? They smell considerably better than kerosene and are in the defined list of PODFs.

And while we're on the subject, take a look at Table 3.4 of the attached EPA document. I assume that CAPSUR, hexane, TechXract and Aluminum Brightner were added to the category of "performance-based organic decontamination solvents" based on similar performance to the PODFs also listed (kerosene, diesel, terpene hydrocarbons). If that's the case, does that "qualify" them as an "organic
solvent in which PCBs are soluble to at least 5 percent by weight?" Also note that Z-Green and Big Orange are listed as being suitable for Subpart S double wash-rinse purposes. And, also note the examples of cleaning solvents deemed good for "removal of PCBs non-porous surfaces including PCBs sorbed to settled dust."

Good enough for us?

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From: Tisa, Kimberly
Sent: Thursday, January 28, 2016 7:24 AM
To: Haklar, James <Haklar.James@epa.gov>; Mullin, Michelle <Mullin.Michelle@epa.gov>; Bean, Mark <Bean.Mark@epa.gov>; Bunker, Kelly <Bunker.Kelly@epa.gov>; Dandurand, Michael <dandurand.michael@epa.gov>; Feely, Ken <Feely.Ken@epa.gov>; Hensley, Amy <Hensley.Amy@epa.gov>; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Sales, James <sales.james@epa.gov>; Santos, Carmen <Santos.Carmen@epa.gov>; South, Brenda <South.Brenda@epa.gov>
Cc: Gimlin, Peter <Gimlin.Peter@epa.gov>; Courtnage, Robert <Courtnage.Robert@EPA.GOV>; Schulz, Susan <Schulz.Susan@epa.gov>
Subject: RE: what solvent should a school use to clean up a leak from a FLB?

I've seen different things here, including Capsur, Less than 10, etc. Bottom line is that I know of none that have gone through the testing to prove it meets the technical requirements for removal of PCBs. Thus, the cleaning has been followed by verification sampling.

For accessible surfaces (e.g., desktops, counters, etc) we've used 1 µg/100 cm^2; non-accessible surfaces (e.g., above windows or ceilings), a decon standard of < 10 µg/100 cm^2 has been applied.

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From: Haklar, James
Sent: Thursday, January 28, 2016 7:17 AM
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Cc: Gimlin, Peter <Gimlin.Peter@epa.gov>; Courtnage, Robert <Courtnage.Robert@EPA.GOV>; Schulz, Susan <Schulz.Susan@epa.gov>
Subject: RE: what solvent should a school use to clean up a leak from a FLB?

NYC was using CAPSUR but that is kind of aggressive and on some surfaces (like a desk) and can result in a "crazed" appearance. I will find out what NYC is currently using but the more important point is that your school should probably be taking verification wipe samples after cleaning (like NYC does).

From: Mullin, Michelle
Sent: Wednesday, January 27, 2016 7:39 PM
To: Bean, Mark <Bean.Mark@epa.gov>; Bunker, Kelly <Bunker.Kelly@epa.gov>; Dandurand, Michael <dandurand.michael@epa.gov>; Feely, Ken <Feely.Ken@epa.gov>; Haklar, James <Haklar.James@epa.gov>; Hensley, Amy <Hensley.Amy@epa.gov>; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Sales, James <sales.james@epa.gov>; Santos, Carmen <Santos.Carmen@epa.gov>; South, Brenda <South.Brenda@epa.gov>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>
Cc: Gimlin, Peter <Gimlin.Peter@epa.gov>; Courtnage, Robert <Courtnage.Robert@EPA.GOV>
Subject: what solvent should a school use to clean up a leak from a FLB?

Hi All-

A school asked me earlier this week what solvent they should use to clean up leaks from their FLBs. They are inspecting lights to remove any PCB FLBs, and apparently finding multiple ballasts with black goo leaked out. Also, they had a ballast leak onto a desk and a linoleum floor. I looked in the regs, and aside from recommending kerosene or diesel fuel, it states that "the solubility of PCBs in any solvent used for purposes of decontamination under this section must be 5 percent or more by weight."

That's not really the kind of thing that will be written on a package. So they, and I, have no idea what they should actually use. All of our guidance docs, including the recent PCBs in buildings Q&A merely point them back to the regs to see how to clean.

Anyone have any products they recommend? The school is not too fond of using kerosene in their classrooms.

Thanks!

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